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RIVERVIEW
School District No. 407

July 27, 2004

Environmental Planning
King County Dept. of Natural Resources and Parks
Wastewater Treatment Division
King Street Center, M.S. KSC-NR-0505
201 South Jackson Street
Seattle, WA 98104-3855

Re: Carnation Wastewater Treatment Facility Draft EIS

I am writing this letter on behalf of the Riverview School District to provide comments on the possible sites for the Carnation Wastewater Treatment Facility. While our school district is supportive of the wastewater treatment plant, we do have numerous concerns regarding the Weckwerth site which borders Tolt Middle School in Carnation.

O1-1 | One of our areas of concern is air quality in Chapter 5. Our school district would like to request that additional information be provided on why no significant impacts to air quality are anticipated during construction and how adverse impacts can be mitigated with construction best practice and through compliance with applicable permit requirements and conditions.

O1-2 | On page 5-5 it states that the impacts to air quality during construction are not expected to be significant. We strongly disagree and believe that there will be very significant impacts on our 700+ students and staff and our educational environment during construction. The Environmental Impact Statement Draft stated the following impacts over 18 to 24 months construction phase:

1. fugitive dust generated by workers' vehicles & equipment
2. vehicle exhaust generated by workers' vehicle & equipment
3. fugitive dust and diesel fumes from excavation
4. odors from asphalt paving
5. traffic flow due to construction equipment, material hauling and detours for excavation and grading
6. increased traffic emissions due to construction delays
7. noise and dust from 645 truck trips hauling excavated materials and loose soil
8. construction from 7:00 AM to 7:00 PM, conflicting school in session, and
9. possible release of containments (HAPs & TAPs) if cleanup of contaminated soil is required.

The Riverview School District, as an extension of the greater community, and working in tandem with the family, will educate all children to become responsible citizens with a passion for learning, a foundation of skills, knowledge and experience; and with the creativity and resiliency to thrive in a dynamic world.

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Special Districts and Other Governmental Entities

Riverview School District (O1)

Response to Comment O1-1

Chapter 5, Sections 5.2.1.3 and 5.2.2.3 have been revised to provide more detail on construction air quality impact mitigation measures that could be used at the treatment plant sites. With respect to mitigation through permit requirements, the grading and/or building permit issued by the City of Carnation would require dust control. In addition, the Puget Sound Clean Air Agency requires that projects meet performance standards for dust and vehicle emissions.

If the Weckwerth site were chosen, King County would apply the appropriate mitigation measures to minimize the air quality impacts of construction. With these measures and because the impacts would be temporary these impacts are not expected to be significant. King County would work with the School District to make sure all reasonable measures were taken to reduce potential air quality impacts.

Response to Comment O1-2

Please see the response to the previous comment.

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- O1-3 During operation of the treatment plant, air quality could affect our 700+ students and employees in the following ways:
1. odor emissions during warm weather and at points of turbulence within the collection and treatment process
 2. odor impact to surrounding property (Tolt Middle School) during operation and with breezy weather conditions, and
 3. release of volatile organic compounds (VOCs) or aerosols.
- O1-4 In addition, during storage of solids or pumping into transport trucks, odor would be released affecting Tolt Middle School. Also employee vehicles and truck haul trips would contribute to air pollutants and odors.
- O1-5 On page 5-9, it states that students and employees of the adjacent school could experience fugitive dust and exhaust odors since construction hours would coincide with school hours. From our view, Tolt Middle School would be heavily impacted with dust and odors during the construction phase.
- O1-6 In Chapter 10, Environment Health, noise impact is described. On page 10-2, it states that treatment plant construction noise is exempt from WAC 173-60-050. While it is exempt, treatment plant construction noise would have a huge impact on student learning at Tolt Middle School. The Weckwerth site is adjacent to our campus with classrooms within 35' of the road and potential construction 64' from classrooms.
- O1-7 The draft also states that the impact would not be expected to be significant to the general community. Again, while it may have minimal impact on our community, Tolt Middle School students and staff will be heavily impacted by noise during the 18 to 24 month construction phase. Heavy equipment such as dozers and backhoes and heavy trucks emit loud noises. The study also states that diesel powered construction equipment makes more noise than gasoline powered vehicles. They also state that the low frequency of diesel engines travels farther and can impact older homes with single-pane windows and less insulation. Our classrooms which are located closest to the construction site are 20 year old portables with single pane windows and less insulation than regular school buildings.
- O1-8 The study states that adjacent properties would unavoidably be exposed to construction noise including worker vehicle engines, heavy trucks delivering materials, and small equipment such as drills, saws and hammers. In addition, our students and staff would also be exposed to noise from demolitions and construction activities, engines and back up alarms. Also spills of fuels, oils, lubricants, or other substances can occur during transport or on-site during construction.

Response to Comment O1-3

The operation mitigation measures described in Section Chapter 5, Section 5.2.1.3 would minimize these impacts.

Response to Comment O1-4

The measures described in Chapter 5, Sections 5.2.1.2 and 5.2.1.3, would keep odors from solids handling (including storage) at low levels. As the discussions in these sections indicate, solids would be in enclosed containers at all times. Air from solids storage tanks would be passed through the odor control system described in Section 5.2.1.3 before being released to the atmosphere. Stored solids would be pumped through hoses to sealed tanker trucks for transport. The hoses would be connected to the trucks before any solids were pumped through them. As a result, very little odor would be released during the transfer.

As discussed in Chapter 14, Section 14.2.1.2, during operation the treatment plant would only generate about 10 to 16 one-way truck and auto trips per week. This small number of trips is not expected to produce substantial air pollution or odor.

Response to Comment O1-5

Please see the response to comment O1-1 above.

Response to Comment O1-6

Chapter 10, Section 10.2.1.1 has been revised to list two more construction noise impact mitigation measures that could be used at treatment facility sites. Later in that section additional mitigation measures have been added to the list of those that could be used to minimize operation noise impacts.

If the Weckwerth site were chosen, King County would apply the appropriate mitigation measures to minimize the noise impacts of construction and operation. With these measures these impacts are not expected to be significant. King County would work with the School District to make sure all reasonable measures were taken to reduce potential construction and operation noise impacts.

Response to Comment O1-7

Please see response to comment O1-6, above.

Response to Comment O1-8

Please see the response to comment O1-6, above for potential measures to minimize construction noise.

Please see Chapter 10, Section 10.2.1.1 for potential measures to prevent and contain chemical spills during construction.

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- O1-9 Section 10.4, Significant Unavoidable Adverse Impacts, states no significant adverse environmental health impacts are anticipated from construction or operation of the treatment facility alternatives. The School Board and Administration of the Riverview School District totally disagrees. We believe that the noise will have a huge impact on student learning over an 18-24 month construction period. This section contains nineteen words stating no significant impact. It is difficult for us to understand how anyone would not realize the huge impact on our students.
- O1-10 The Riverview School District is very interested in participating in any activity which will assist the aesthetics of the treatment plant addressed in Chapter 12. If possible, our district would like to use the treatment as an educational site for class tours, etc.
- O1-11 In Chapter 14, Transportation, there is no mention that the Weckwerth site is in a school zone. It seems that Section 14.1.2.2, 14.1.4.2, 14.2.1.2, 14.3 should all reference that this area is in a school zone.
- O1-12 To the Riverview School District, transportation is another large impact with the Weckwerth site. The study states that during the 18 to 24 month construction cycle, approximately 3,500 one-way vehicle trips will impact the Tolt Middle School school zone. This has a definite impact on our school district safely transporting our students to and from school, arrival and departure time for staff, parents transporting their children to school on their way to work, classes beginning on time, and the normal car and truck traffic identified in Section 14.1. In addition, if this added congestion at Tolt Middle School causes our buses to depart later than scheduled, all of our elementary schools will also be impacted. These same buses provide transportation for students K-12. The prompt arrival and departure of our school buses are essential to the rest of the school district effectively educating our students with class beginning on time and not enduring classroom disruptions due to transportation delays.
- O1-13 Chapter 15, Environmental Impact and Mitigation, also fails to identify that the Weckwerth site is in a school zone. Section 15.2.1.1 mentions law enforcement and fire and emergency service but fails to mention the impact on another public service – Tolt Middle School.
- O1-14 Section 15.2.1.3 needs to elaborate on how school zone impacts will be mitigated, how emergency services will be coordinated with the school district and how Tolt Middle School and Carnation Elementary School will be addressed in the Hazardous Materials Spill Prevention Plan.

Response to Comment O1-9

Please see the response to comment O1-6, above.

Response to Comment O1-10

King County conducts tours for school students at its existing treatment plants. We will work with the school district to identify educational opportunities associated with the treatment facility.

Response to Comment O1-11

Chapter 14, Section 14.1.2.2 has been revised to identify the school zone associated with the Tolt Middle School on Tolt Avenue.

Response to Comment O1-12

Chapter 14, Section 14.2.1.3 has been revised to add a measure to minimize construction traffic during peak morning and afternoon student transportation periods associated with Tolt Middle School. King County expects this and the other mitigation measures described in Section 14.2.1.3 to ensure that construction traffic would not disrupt transportation to and from the school.

Response to Comment O1-13

Chapter 15, Section 15.1.2.1 has been revised to identify the school zone associated with the Tolt Middle School on Tolt Avenue.

Chapter 15, Section 15.2.1.1 has been revised to address public schools.

Response to Comment O1-14

Since a school zone only addresses vehicle speed limits, the project should have no impacts on the school zone.

If an emergency situation occurred at the facility, King County would notify the fire department and the fire department would be responsible for coordination with local schools. As part of the permit application process, King County would prepare the emergency response and hazardous spill prevention plans and submit them as appropriate with its building permit application to the City of Carnation or the fire department. The plans would describe the substances to be used and stored on the site and the manner of their use and storage. Safety measures would also be described. The City and/or fire department would review the plans to make sure they met their requirements. Any aspects of the plans that did not meet these requirements would have to be revised so that they did. The fire department would periodically inspect the facility to ensure continued compliance with its regulations.

Once the plans were approved, the fire department would be aware of the types, volumes, locations and other relevant aspects of substances on the site. In this way the fire department could make sure it had access to the resources necessary to deal with releases of any of these substances.

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O1-15 In the Draft Environmental Impact Statement, technical memorandums, page 904, section 3.1.7 chemical delivery, states that large trucks up to 72 feet long deliver chemicals. This requires an exterior concrete pad designed for containment of any overflow. The chemical delivery and containment of any overflow also are great concerns to the school district. If an accident occurs and chemicals are exposed, we have over 700 students and staff within feet of accidents.

O1-16 In addition to concerns and impacts stated in the study, we have children with very delicate health and handicapping conditions. One child is legally blind and is dependent on sound to hear and learn. Any noise is a problem, let alone major construction noise which would make learning impossible. Another child is extremely sensitive to odors and has physical reactions. Many safeguards are presently in place to assist the student and minimize impact on learning. Chemicals, diesel fumes, and asphalt installation during construction would have a huge impact on the health of this student. Even the odors and chemicals from the operation of the treatment plant would potentially affect the health of this student.

O1-17 While the 18 to 24 month construction phase would negatively impact all of our students and staff, special education children would be especially impacted. These are the students who are especially sensitive to noise and distractions. A minor construction or remodeling project would create educational issues for these students. A major construction project, like a waste treatment facility, would create huge issues for these special students.

In conclusion, the Riverview School District is supportive of a waste treatment plant in Carnation, but believes that the Weckwerth site is an extremely poor choice due to the negative impact on 700+ students and staff who are within feet of the site. We are of the understanding that the city-owned site is less expensive, has more acreage, and would negatively affect far less people.

Thank you for the opportunity to provide comments on this matter.

Sincerely,

RIVERVIEW SCHOOL DISTRICT



Conrad Robertson
Superintendent of Schools

cc: Riverview School Board of Directors
Carnation City Council

Response to Comment O1-15

The list of measures to minimize accidental leaks and spills during operation common to all treatment facilities in Chapter 10, Section 10.2.1.1 has been expanded to provide more detail on measures that could be taken to minimize the risk of and respond to accidental leaks or spills during operation of the treatment facility. These measures include sloping of spill-prone areas toward the treatment plant so that any spilled substances would drain back to the plant for treatment. Areas where chemicals would be transferred from trucks would be sloped in this manner.

Chapter 10, Section 10.2.1, subsection “Accidental Spills During Operation of the Treatment Plant” has been revised to point out that in the event of a spill none of the chemicals used at the plant would cause impacts beyond the immediate vicinity of the spill.

Response to Comment O1-16

Please see the responses to comments O1-3 and O1-6.

Response to Comment O1-17

Please see the responses to comments O1-3 and O1-6.

July 27, 2004

Environmental Planning and Community Relations Unit
King County Wastewater Treatment Division
201 South Jackson Street
Seattle, WA 98104

To Whom it May Concern:

The Snoqualmie Watershed Forum appreciates the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Carnation Wastewater Treatment Facility. The Snoqualmie Watershed Forum operates under an interlocal agreement between King County and the Cities of Carnation, Duvall, Snoqualmie and North Bend and works to improve salmonid habitat and water quality and to address flooding concerns in the Snoqualmie Watershed. Over the past four years, the Snoqualmie Watershed Forum has actively participated in the development of the Snohomish River Basin Salmon Conservation Plan. This plan is designed to meet the needs of Chinook and coho salmon and bull trout in Water Resource Inventory Area (WRIA) 7.

In a letter submitted during the scoping phase of this DEIS, the Forum strongly supported the use of advanced levels of treatment to reclaim the wastewater for beneficial uses. The Forum supported the use of highly treated water for mitigating any impacts of this project. The Forum continues to support considering using reclaimed water from the facility for irrigation of local farms or parks or in a wetland restoration project.

O2-1

Of the three discharge Alternatives in the DEIS, the Snoqualmie Watershed Forum encourages the selection of the Expanded Wetland Discharge Alternative wherein highly treated water would be used to create and/or modify wetlands in the Stillwater Wildlife Area north of Carnation. The Forum endorses this discharge alternative for the following reasons:

O2-2

- 1) The Wetland Discharge Alternative could provide the benefits of enhanced off-channel rearing habitat for Chinook and coho salmon in the Snoqualmie River.
 - a. The Ecological Analysis for Salmonid Conservation written by the Snohomish Basin Salmon Recovery Technical Committee identifies that a dearth of off-channel rearing habitat is a limiting factor for Chinook salmon in the Snoqualmie River.
 - b. Harris Creek is a highly productive basin for coho salmon, which rely heavily on wetland habitat for rearing and overwintering. The Snoqualmie Watershed Forum is very interested in preventing the future listing of coho salmon under the Endangered Species Act. The Enhanced Option of this alternative could provide significant benefit for this species.

O2-3

- 2) The Wetland Discharge Alternative, when compared with the River Discharge Alternative, would result in less disturbance of critical Chinook salmon habitat in

Snoqualmie Watershed Forum (O2)

Response to Comment O2-1

King County will continue to evaluate this and the other discharge alternatives discussed in the EIS to determine the optimal approach.

Response to Comment O2-2

Chapter 7, Section 7.2.2.2, Expanded Wetland Discharge Option has been changed to note these benefits.

Response to Comment O2-3

Table 3-3 has been changed to indicate that construction of the river discharge alternative has a greater potential to adversely affect Chinook salmon habitat than the other discharge alternatives.

Chapter 3, Section 3.1.2.1 describes the construction of the river discharge. As that section states, construction would consist of installing an 8 to 10-inch pipe. Measures to minimize impacts and restore habitat are described in that section as well.

Chapter 7, Section 7.2.2.1 describes the potential adverse impacts of river discharge construction on salmon. As pointed out in that section, compliance with permit conditions and use of the types of mitigation measures described in the EIS should keep the magnitude of these impacts at a minor level.

Given the minor, short-term nature of construction, the measures that would be used to minimize impacts, and the minor infrequent nature of maintenance, it appears unlikely that the river discharge alternative would be counterproductive to salmon recovery efforts.

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O2-3 the Snoqualmie River, thereby causing the least amount of harm to local Chinook salmon populations.

a. The mainstem of the Snoqualmie River below the confluence with the Tolt River is a very productive Chinook salmon spawning area. The amount of construction needed to install and maintain the River Discharge Alternative could be counterproductive to the salmon recovery efforts planned for this area.

O2-4

3) Because of the unknown impacts of Endocrine Disrupting Chemicals (EDCs) in highly treated water, the Wetland Discharge Alternative would minimize the potentially deleterious impacts of effluent by using the natural filtration of a wetland system to further purify water before entering the river.

4) And finally, the Snoqualmie Watershed Forum supports the Wetland Discharge Alternative because it provides opportunity to showcase the multiple benefits for people and fish resulting from large-scale construction and mitigation projects in the Snoqualmie Watershed. Projects such as this may help demonstrate that what is beneficial for people can also be beneficial for fish.

Thank you for the opportunity to comment on this process. If you have any questions, please contact James Schroeder, Snoqualmie Watershed Forum staff, at 206-206-8309 or at james.Schroeder@metrokc.gov.

Sincerely,

Mark Sollitto
Chair
Snoqualmie Watershed Forum

cc: Snoqualmie Watershed Forum Members
Sandra Kilroy, Snoqualmie Watershed Coordinator

Response to Comment O2-4

Some scientific studies have shown that EDCs are further degraded in wetland environments. It is still uncertain, however, whether and to what extent this may occur. The treatment facility would be designed to produce highly treated water that met State of Washington reclaimed water standards before this water was discharged to the wetlands. Additional treatment by the wetlands, while likely, is not included in facility planning.